



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: August 3, 2004

REPLY TO
ATTN OF: CBFO:QA:MPN:GS:04-1582:UFC 2300.00

SUBJECT: Closure of Corrective Action Report 04-030

TO: Mark S. French, DOE-RL

The Carlsbad Field Office (CBFO) performed Verification of Corrective Action Completion for Corrective Action Report (CAR) 04-030. The corrective actions taken and implemented for this CAR has been evaluated by review of objective evidence received from Fluor Hanford in the following transmittals:

- Letter Richard P. Dunn to A.L. Holland, CBFO, "Accelerated Audit Corrective Action Report Number 04-030 and Hanford CAR TRU-SPO-04-033 Corrective Action Closure Documentation – FH-0402188", dated July 21, 2004
- E-Mail dated 7/28/04, D. DeRosa to M. Navarrete transmitting the revised Fluor Memorandum – D. Arrenholz to R. P. Dunn M4T00-TRU-04-500, R1, "Investigative Analysis of Acceptable Knowledge Accuracy Misinterpretation and Impact Evaluation – Response to CBFO Corrective Action Report 04-030", Dated July 27, 2004.

The results of the evaluation indicate that Fluor Hanford has adequately addressed the issues identified in CAR 04-030 and has adequately implemented the corrective actions to close this CAR.

CAR 04-030 has been closed based on the CBFO verification of the corrective actions. The CAR continuation sheet documenting verification of corrective action completion and closure of the CAR is attached.

If you have any questions or comments, please contact me at (505) 234-7483.

Martin P. Navarrete
Quality Assurance Specialist

Attachments

040804



Mark French

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August 3, 2004

cc: w/attachments

A. Holland, CBFO *ED

K. Watson, CBFO *ED

D. DeRosa, FH *ED

S. Bisping, FH *ED

G. Higgins, RL *ED

M. Eagle, EPA *ED

E. Feltcorn, EPA *ED

S. Zappe, NMED *ED

D. Winters, DNFSB *ED

J. May, CTAC *ED

P. Rodriguez, CTAC *ED

A. Pangle, CTAC *ED

L. Greene, WRES *ED

WIPP Operating Record, MS 486-06

CBFO QA File

CBFO M&RC

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 04-030

2. Activity Report No. A-04-19

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Block # 18, Verification of Corrective Action Completion

Reviewed the completion of corrective actions for CAR 04-030 as submitted on the following transmittals:

- Letter Richard P. Dunn to A. L. Holland, CBFO, "Accelerated Audit Corrective Action Report Number 04-030 and Hanford CAR TRU-SPO-04-033 Corrective Action Closure Documentation - FH-0402188", dated July 21, 2004
- E-Mail dated 7/28/04, D. DeRosa to M. Navarrete transmitting the revised Fluor Memorandum - D. Arrenholz to R. P. Dunn M4T00-TUR-04-500, R1, "Investigative Analysis of Acceptable Knowledge Accuracy Misinterpretation and Impact Evaluation - Response to CBFO Corrective Action Report 04-030", Dated July 27, 2004.

The above submittals transmitted the objective evidence to support closure for the condition adverse to quality identified in CBFO Corrective Action Report (CAR) 04-030. The condition adverse to quality, actions taken for each condition and objection evidence to support these actions were evaluated during closure verification activities as follows:

Condition Adverse to Quality

During the review of AK objective evidence the following conditions adverse to quality were identified in relation to the performance of RTR for confirmation of AK:

- RTR is identifying drums containing such items as, penlight w/batteries, light bulbs and fuses, floodlight bulbs, and lead gloves that AK had placed in the non-mixed PFP waste stream, NPUREXD. Hanford generated NCRs to address moving the affected drums from the non-mixed waste stream to the mixed waste stream (MPUREXD) and adding new hazardous waste numbers. However, Hanford does not include these drums in the calculation of AK accuracy (Hanford AK Performance Report) as required by WAP B4-3e and Hanford procedure WMP-400 Section 7.1.9 para. 4.6.8c.

This condition adverse to quality relates to the condition documented on CBFO CAR 03-064 (closed 7/29/03). Hanford completed all corrective actions and submitted satisfactory objective evidence, however, due to a misunderstanding as to the point within the certification process at which AK accuracy was performed, this issue is on going.

- Historical RTR data for containers in both mixed and non-mixed debris streams from Purex and PFP has been reviewed as a source of AK information. However, the information contained in this historical data is not in all cases consistent with the presence or absence of prohibited items as documented in the Waste Stream Summaries.

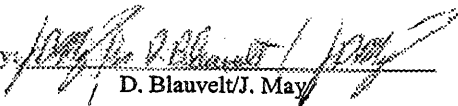
Closure Verification

Verified through review of the following submitted objective evidence that the corrective actions documented in the approved Corrective Action Plan were completed and are acceptable:

- Acceptable Knowledge (AK) Accuracy Reports for NPFPD and NPUREXD
- Investigative Analysis (Revised version dated July 27, 2004)
- WMP-400, Waste Isolation Pilot Plant (WIPP) Procedure Section 7.1.9, Rev 16
- Course completion Training Roster for WMP-400, Section 7.1.9
- Revised AK Summary Reports for NPFPD, MPFPD, NPUREXD, and MPUREXD waste Streams
- Course Completion Training roster for AK Accuracy Expectations
- Closed Hanford Site CAR TRU-SPO-04CAR-033

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

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<p>Based on completion and verification of the above corrective actions, it is recommended that CAR 04-030 be closed.</p> <p>Block # 19a, Verified by: <u></u> Date: <u>7/28/04</u> D. Blauvelt/J. May</p> <p>Block #19b, Trend Cause Code: 3.2, Inattention to detail and 3.4, Communication Problem</p>		